## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA,	)
	)
v.	)
	) Case No. 3:22-CR-00282
GLEN CASADA and	) District Judge Eli J. Richardson
CADE COTHREN	)
	, )
Defendants.	, )

# DEFENDANT CADE COTHREN'S MOTION TO EXTEND DEADLINES AS TO RULE 29 AND RULE 33 MOTIONS

Comes now Defendant Cade Cothren, by and through undersigned counsel, and hereby moves this Court for an Order extending the deadlines to file a notice of a general motion for a judgment of acquittal or a specific motion pursuant to Federal Rule of Criminal Procedure 29. Mr. Cothren seeks a similar extension of his deadline to file a motion for new trial pursuant to Federal Rule of Criminal Procedure 33.

The verdict at the trial in this matter was returned on May 16, 2025. Following the verdict, the Court ordered that, by May 30, 2025, Defendants file a specific Rule 29 motion or a notice preserving all general Rule 29 motions made at the close of the government's case and after the close of all the evidence. Pursuant to Federal Rule of Criminal Procedure 33(b)(2), the current deadline for Mr. Cothren to file a motion for new trial is May 30, 2025. Mr. Cothren requires additional time to obtain and review trial transcripts and to prepare his Rule 29 and 33 filings. Undersigned counsel will also be out of the country for two weeks beginning June 27, 2025. Therefore, Mr. Cothren requests that these deadlines be extended to a date not earlier than July 31, 2025.

Undersigned counsel conferred with counsel for the government on May 28, 2025, who stated that they oppose the extensions requested herein. However, the government does not oppose a one-month extension of the deadline to file a Rule 33 motion to June 27, 2025, provided that a similar

extension is granted to the government and Mr. Cothren does not use this extension as a basis to continue sentencing. Counsel do not expect to receive trial transcripts until 30 days from the date of this filing, at the earliest. Although Mr. Cothren is not opposed to extending the government's deadlines to respond to his forthcoming filings, he is not in a position to know whether sentencing will need to be continued at some point in the future.

For the foregoing reasons, Mr. Cothren respectfully requests this Court enter an Order extending the deadlines to file a to file a specific motion for a judgment of acquittal pursuant to Federal Rule of Criminal Procedure 29, or a notice preserving his general Rule 29 motions, and a motion for new trial pursuant to Federal Rule of Criminal Procedure 33 from May 30, 2025 to July 31, 2025.

### Respectfully Submitted,

## Sherwood Boutique Litigation, PLC

/s/ Cynthia A. Sherwood

Cynthia A. Sherwood, #20911 Austin M. Correll, #39561 414 Union Street Suite 1110 Nashville, TN 37219 T: 615-873-5670 F: 615-900-2312 cynthia@sherwoodlitigation.com austin@sherwoodlitigation.com

#### Barnes & Thornburg LLP

/s/ Joy Boyd Longnecker

Joy Boyd Longnecker, #29627 1600 West End Avenue Suite 800 Nashville, TN 37203 T: 615-621-6012 joy.longnecker@btlaw.com

Counsel for Defendant Cade Cothren

#### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing motion was electronically filed with the Clerk on May 29, 2025, and service was made upon the following via CM/ECF and/or by email.

Edward M. Yarbrough Jonathan P. Farmer Steven C. Fann Spencer Fane LLP 511 Union Street Suite 1000

Nashville, TN 37219 eyarbrough@spencerfane.com jfarmer@spencerfane.com cfann@spencerfane.com

John P. Taddei
Blake J. Ellison
U.S. Department of Justice
Public Integrity Section
1301 New York Ave. NW
Ste 10th Floor
Washington, DC 20530
john.taddei@usdoj.gov
blake.ellison@usdoj.gov

Taylor J. Phillips U.S. Attorney's Office 719 Church Street Suite 3300 Nashville, TN 37203 taylor.phillips@usdoj.gov

W. David Bridgers L. Wells Trompeter Holland & Knight LLP 511 Union Street, Suite 2700 Nashville, Tennessee 37219 david.bridgers@hklaw.com wells.trompeter@hklaw.com

Ben M. Rose RoseFirm, PLLC Post Office Box 1108 Brentwood, Tennessee 37024 ben@rosefirm.com

/s/ Cynthia A. Sherwood